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Attorney for Dr. Maninder Herr

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,

Plaintiff,

v.

Dr. Maninder Herr,

Defendant.

Case No. 2:24-cv-01724-JCM-DJA

**Stipulation to Extend Time to Answer
or Otherwise Plead**

(First Request)

Plaintiff, United States of America, by and through United States Attorney, Jason M. Frierson, and Assistant United States Attorney, Reem Blaik; and Defendant Dr. Maninder Herr, by and through his counsel of record, Sunethra Muralidhara Esq., of Wright Marsh & Levy, hereby stipulate and agree that the Defendant's deadline to answer or otherwise respond to Plaintiff's Complaint, currently due November 29, 2024, should be extended 30 days until December 30, 2024. This extension is sought for the following reasons:

1. A complaint was filed on or about September 16, 2024. ECF 1.
2. Counsel was retained by defendant on or about October 15, 2024. Counsel has been diligently reviewing case materials and getting up to speed on the current status of the case as well as conducting her own investigation. On October 18, 2024, counsel

1 accepted service of the Complaint and acknowledged the due date to Answer of
2 November 29, 2024.

3 3. The parties are in the process of good faith negotiations and require additional time to
4 discuss potential resolution short of litigation. The defense is also continuing to
5 investigate the alleged violations.

6 4. This request is not sought for purposes of delay and made in good faith. This is the
7 parties' first request for a continuance.

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9 WRIGHT MARSH & LEVY

JASON M. FRIERSON
UNITED STATES ATTORNEY

10 By: /s/ Sunethra Muralidhara
11 Sunethra Muralidhara, Esq.
12 Counsel for Defendant Herr

By: /s/ Reem Blaik
REEM BLAIK
Assistant United States Attorney

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16 **IT IS SO ORDERED:**

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19 **United States Magistrate Judge**

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21 **Dated:** 12/3/2024
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